

# EXHIBIT 6

**Whisler, Megan**

---

**From:** Ashby, Danny S.  
**Sent:** Friday, October 14, 2022 4:56 PM  
**To:** Lollar, Tirzah; Andrew Stephens; Margolis, Craig D.; Odell, Christopher M.; Godesky, Leah; Chapa, Justin R.; Santella, Amanda M.  
**Cc:** Raymond Winter; Amy Hilton; Heather Hacker; Hilton, Christopher; Eugenia Krieg; Michael Moore; Drew Wright; Ramer, Paula  
**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Hi Andrew -

We completely disagree with your description of our September 27 meet and confer and we are opposed to your motion for the same reasons outlined below and in my earlier email today. Thanks.

Danny

Danny S. Ashby  
O: +1-972-360-1904  
M: +1-214-577-9886  
[dashby@omm.com](mailto:dashby@omm.com)

---

**From:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>  
**Sent:** Friday, October 14, 2022 4:42 PM  
**To:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>; Ashby, Danny S. <[dashby@omm.com](mailto:dashby@omm.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; Godesky, Leah <[lgodesky@omm.com](mailto:lgodesky@omm.com)>; Chapa, Justin R. <[jchapa@omm.com](mailto:jchapa@omm.com)>; Santella, Amanda M. <[asantella@omm.com](mailto:asantella@omm.com)>  
**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Hilton, Christopher <[Christopher.Hilton@oag.texas.gov](mailto:Christopher.Hilton@oag.texas.gov)>; Eugenia Krieg <[Eugenia.Krieg@oag.texas.gov](mailto:Eugenia.Krieg@oag.texas.gov)>; Michael Moore <[Michael.Moore@oag.texas.gov](mailto:Michael.Moore@oag.texas.gov)>; Drew Wright <[Drew.Wright@oag.texas.gov](mailto:Drew.Wright@oag.texas.gov)>; Ramer, Paula <[Paula.Ramer@arnoldporter.com](mailto:Paula.Ramer@arnoldporter.com)>  
**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

**[EXTERNAL MESSAGE]**

Andrew:

As an initial matter, we don't see a basis for the extraordinary relief you are requesting, nor are we aware of any authority to support the request. In addition, Affiliates have yet to complete their production of all documents hitting on the term "Medicaid" for any custodians (productions have been slightly delayed given ECF 214), so we do not understand how Relator can contend that Affiliates' production is deficient for "similar reasons" to those discussed on the September 27 meet and confer with PPFA. We are disappointed that Relator yet again has chosen to file a motion without engaging in a meaningful meet and confer process. If Relator intends to file the motion without further discussion of any specific concerns, please state that Affiliates oppose the motion to compel, as well as the motion to expedite briefing on this issue that they only just learned about a few hours ago.

Thanks,  
Tirzah

---

Tirzah Lollar  
Partner | [Bio](#)

## Arnold & Porter

601 Massachusetts Ave., NW

Washington, DC 20001-3743

T: +1 202.942.6199

[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)

[www.arnoldporter.com](http://www.arnoldporter.com) | [LinkedIn](#) | [Twitter](#)

---

**From:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>

**Sent:** Friday, October 14, 2022 4:59 PM

**To:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; [zzz.External.dashby@omm.com](mailto:zzz.External.dashby@omm.com) <[dashby@omm.com](mailto:dashby@omm.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [zzz.External.lgodesky@omm.com](mailto:zzz.External.lgodesky@omm.com) <[lgodesky@omm.com](mailto:lgodesky@omm.com)>; [zzz.External.jchapa@omm.com](mailto:zzz.External.jchapa@omm.com) <[jchapa@omm.com](mailto:jchapa@omm.com)>; [zzz.External.asantella@omm.com](mailto:zzz.External.asantella@omm.com) <[asantella@omm.com](mailto:asantella@omm.com)>

**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Hilton, Christopher <[Christopher.Hilton@oag.texas.gov](mailto:Christopher.Hilton@oag.texas.gov)>; Eugenia Krieg <[Eugenia.Krieg@oag.texas.gov](mailto:Eugenia.Krieg@oag.texas.gov)>; Michael Moore <[Michael.Moore@oag.texas.gov](mailto:Michael.Moore@oag.texas.gov)>; Drew Wright <[Drew.Wright@oag.texas.gov](mailto:Drew.Wright@oag.texas.gov)>; Ramer, Paula <[Paula.Ramer@arnoldporter.com](mailto:Paula.Ramer@arnoldporter.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Danny, Tirzah,

When we met and conferred on September 27 regarding PPFA's noncompliance with the Court's order granting our motion to compel, we explained several deficiencies in PPFA's production, including specific documents that should have been produced and sources of information that had not been collected or searched. We have also discussed several times on calls and in emails our position that the PPFA Affiliates' production is deficient for similar reasons. Rather than file a motion for sanctions or contempt at this time, we are filing the motion referenced in my email below to address PPFA's noncompliance and to request the appointment of a forensic examiner to get the documents that Defendants' were ordered to produce.

Please let me know if you are opposed or unopposed.

Thank you,

Andrew

---

**From:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>

**Sent:** Friday, October 14, 2022 3:33 PM

**To:** [dashby@omm.com](mailto:dashby@omm.com); Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com)

**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Hilton, Christopher <[Christopher.Hilton@oag.texas.gov](mailto:Christopher.Hilton@oag.texas.gov)>; Eugenia Krieg

Case 2:21-cv-00022-Z Document 236-8 Filed 10/26/22 Page 4 of 12 PageID 7499  
<[Eugenia.Krieg@oag.texas.gov](mailto:Eugenia.Krieg@oag.texas.gov)>; Michael Moore <[Michael.Moore@oag.texas.gov](mailto:Michael.Moore@oag.texas.gov)>; Drew Wright  
<[Drew.Wright@oag.texas.gov](mailto:Drew.Wright@oag.texas.gov)>; Ramer, Paula <[Paula.Ramer@arnoldporter.com](mailto:Paula.Ramer@arnoldporter.com)>  
**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew:

We agree with Danny's comments and request.

Thanks,  
Tirzah

---

Tirzah Lollar  
Partner | [Bio](#)

## Arnold & Porter

601 Massachusetts Ave., NW

Washington, DC 20001-3743

T: +1 202.942.6199

[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)

[www.arnoldporter.com](http://www.arnoldporter.com) | [LinkedIn](#) | [Twitter](#)

---

**From:** Ashby, Danny S. <[dashby@omm.com](mailto:dashby@omm.com)>

**Sent:** Friday, October 14, 2022 4:31 PM

**To:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Hussain, Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [zzz.External.lgodesky@omm.com](mailto:zzz.External.lgodesky@omm.com) <[lgodesky@omm.com](mailto:lgodesky@omm.com)>; [zzz.External.jchapa@omm.com](mailto:zzz.External.jchapa@omm.com) <[jchapa@omm.com](mailto:jchapa@omm.com)>; [zzz.External.asantella@omm.com](mailto:zzz.External.asantella@omm.com) <[asantella@omm.com](mailto:asantella@omm.com)>

**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Hilton, Christopher <[Christopher.Hilton@oag.texas.gov](mailto:Christopher.Hilton@oag.texas.gov)>; Eugenia Krieg <[Eugenia.Krieg@oag.texas.gov](mailto:Eugenia.Krieg@oag.texas.gov)>; Michael Moore <[Michael.Moore@oag.texas.gov](mailto:Michael.Moore@oag.texas.gov)>; Drew Wright <[Drew.Wright@oag.texas.gov](mailto:Drew.Wright@oag.texas.gov)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Hi Andrew -

This is coming completely out of the blue and seems like something that we should discuss first. I'm not sure what the reason for this request is and we certainly haven't previously discussed it. Would you please provide some additional context as to what production you are seeking to compel and why you believe that appointment of a forensic examiner is necessary here? As you know, the Court has been explicit about its expectation that the parties confer in good faith to resolve any discovery disputes before they are presented to the Court. Thanks.

Danny

Danny S. Ashby  
O: +1-972-360-1904  
M: +1-214-577-9886  
[dashby@omm.com](mailto:dashby@omm.com)

---

**From:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>  
**Sent:** Friday, October 14, 2022 2:44 PM  
**To:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Hussain, Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; Godesky, Leah <[lgodesky@omm.com](mailto:lgodesky@omm.com)>; Ashby, Danny S. <[dashby@omm.com](mailto:dashby@omm.com)>; Chapa, Justin R. <[jchapa@omm.com](mailto:jchapa@omm.com)>; Santella, Amanda M. <[asantella@omm.com](mailto:asantella@omm.com)>  
**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Hilton, Christopher <[Christopher.Hilton@oag.texas.gov](mailto:Christopher.Hilton@oag.texas.gov)>; Eugenia Krieg <[Eugenia.Krieg@oag.texas.gov](mailto:Eugenia.Krieg@oag.texas.gov)>; Michael Moore <[Michael.Moore@oag.texas.gov](mailto:Michael.Moore@oag.texas.gov)>; Drew Wright <[Drew.Wright@oag.texas.gov](mailto:Drew.Wright@oag.texas.gov)>  
**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

**[EXTERNAL MESSAGE]**

Tirzah, Danny,

We plan to file today a Motion to Compel Production and for Appointment of a Forensic Examiner to Conduct a Review and Examination of Defendants' Computer Systems and Electronic Data. We also plan to ask for expedited consideration of the Motion. Please let me know if you are opposed or unopposed.

Thank you,

Andrew

---

**From:** Andrew Stephens  
**Sent:** Thursday, October 13, 2022 6:54 PM  
**To:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Hussain, Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [dashby@omm.com](mailto:dashby@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com)  
**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>  
**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Thanks, Tirzah. Only change in these is the dates.

Andrew

---

**From:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>  
**Sent:** Thursday, October 13, 2022 6:43 PM  
**To:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Hussain, Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [dashby@omm.com](mailto:dashby@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com)  
**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>  
**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew, we would like to speak with you about the 30b6 notices on Monday. I'm just checking availability on our side and will revert with a proposed timeframe.

Did anything change in these amended notices other than the dates?

Thanks

---

Tirzah Lollar

Partner | [Bio](#)

## Arnold & Porter

601 Massachusetts Ave., NW  
Washington, DC 20001-3743

T: +1 202.942.6199

[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)

[www.arnoldporter.com](http://www.arnoldporter.com) | [LinkedIn](#) | [Twitter](#)

---

**From:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>

**Sent:** Thursday, October 13, 2022 7:40 PM

**To:** Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Hussain, Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [zzz.External.lgodesky@omm.com](mailto:zzz.External.lgodesky@omm.com) <[lgodesky@omm.com](mailto:lgodesky@omm.com)>; [zzz.External.dashby@omm.com](mailto:zzz.External.dashby@omm.com) <[dashby@omm.com](mailto:dashby@omm.com)>; [zzz.External.jchapa@omm.com](mailto:zzz.External.jchapa@omm.com) <[jchapa@omm.com](mailto:jchapa@omm.com)>; [zzz.External.asantella@omm.com](mailto:zzz.External.asantella@omm.com) <[asantella@omm.com](mailto:asantella@omm.com)>

**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Counsel:

Attached are Amended Notices of 30(b)(6) Depositions of PPFA, PPGT and PPGC. If you would like to discuss the dates or locations of these depositions, or the other depositions we have noticed, please let us know and we can schedule a call. Relator and the State are available anytime on Monday (10/17), Wednesday morning (10/19), or Thursday morning (10/20).

Best regards,

Andrew

---

**From:** Andrew Stephens

**Sent:** Tuesday, October 11, 2022 8:04 PM

**To:** Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Hussain, Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [dashby@omm.com](mailto:dashby@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com)

**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Please see attached deposition notices. If you would like to discuss dates and locations please let us know and we can set up a call.

Andrew

**Andrew B. Stephens**

Partner

**HACKER STEPHENS** LLP

[http://secure-web.cisco.com/1HI7SNvaGwtgxo1S6bHQN1aod9oTXFxWGzxVEfdgtq-GOekttXvxO9camPjI-glxOG1fwoj2o4VffTaN6\\_R7kzJvX1uQ\\_ko\\_5bl-eQKyozXK9CIPuTw7HJNHa5cqwaE-qR9OjSEqtdTJa-9qmzdMvLmmNsMnwf5Bc0zKy\\_qapaGYfrvdSFm20WKOz0Wq1lvL6dApHLnDLn0H2GlyNWMBqpm6YmY2LatUp0AEttGc674Z63Z0vFDlm3l6MSxAshsPFbzsdvo01mHeXjh1bEbaRmlZ8brN\\_1TSG\\_7jQmiFYhmVToe6B1qe9RxnofGHk5gCXNsSYsICZqTDoDr7uTZWdpT1KbVbGajlyxMJ3ABycasNqt\\_xRsbv15Gc\\_ijfbwqcyrEeMsRM6uf5Ehj1nUZ9-ZvXGbien2djvbIKWD4O0NHeDeAynoslbSvULzwZnNiK/http%3A%2F%2Fwww.hackerstephens.com](http://secure-web.cisco.com/1HI7SNvaGwtgxo1S6bHQN1aod9oTXFxWGzxVEfdgtq-GOekttXvxO9camPjI-glxOG1fwoj2o4VffTaN6_R7kzJvX1uQ_ko_5bl-eQKyozXK9CIPuTw7HJNHa5cqwaE-qR9OjSEqtdTJa-9qmzdMvLmmNsMnwf5Bc0zKy_qapaGYfrvdSFm20WKOz0Wq1lvL6dApHLnDLn0H2GlyNWMBqpm6YmY2LatUp0AEttGc674Z63Z0vFDlm3l6MSxAshsPFbzsdvo01mHeXjh1bEbaRmlZ8brN_1TSG_7jQmiFYhmVToe6B1qe9RxnofGHk5gCXNsSYsICZqTDoDr7uTZWdpT1KbVbGajlyxMJ3ABycasNqt_xRsbv15Gc_ijfbwqcyrEeMsRM6uf5Ehj1nUZ9-ZvXGbien2djvbIKWD4O0NHeDeAynoslbSvULzwZnNiK/http%3A%2F%2Fwww.hackerstephens.com)

This message contains information that may be confidential and privileged. Unless you are the intended recipient (or authorized to receive for the intended recipient), you may not use, copy, or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by replying or by phone at (512) 399-3022 and delete the message.

---

**From:** Andrew Stephens

**Sent:** Thursday, September 1, 2022 12:07 PM

**To:** Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Hussain, Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [dashby@omm.com](mailto:dashby@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com)

**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's Sixth Requests for Production to PPFA and the PPFA Affiliates.

Andrew

---

**Andrew B. Stephens**

Partner

**HACKER STEPHENS** LLP

[http://secure-web.cisco.com/1HI7SNvaGwtgxo1S6bHQN1aod9oTXFxWGzxVEfdgtq-GOekttXvxO9camPjI-glxOG1fwoj2o4VffTaN6\\_R7kzJvX1uQ\\_ko\\_5bl-eQKyozXK9CIPuTw7HJNHa5cqwaE-qR9OjSEqtdTJa-9qmzdMvLmmNsMnwf5Bc0zKy\\_qapaGYfrvdSFm20WKOz0Wq1lvL6dApHLnDLn0H2GlyNWMBqpm6YmY2LatUp0AEttGc674Z63Z0vFDlm3l6MSxAshsPFbzsdvo01mHeXjh1bEbaRmlZ8brN\\_1TSG\\_7jQmiFYhmVToe6B1qe9RxnofGHk5gCXNsSYsICZqTDoDr7uTZWdpT1KbVbGajlyxMJ3ABycasNqt\\_xRsbv15Gc\\_ijfbwqcyrEeMsRM6uf5Ehj1nUZ9-ZvXGbien2djvbIKWD4O0NHeDeAynoslbSvULzwZnNiK/http%3A%2F%2Fwww.hackerstephens.com](http://secure-web.cisco.com/1HI7SNvaGwtgxo1S6bHQN1aod9oTXFxWGzxVEfdgtq-GOekttXvxO9camPjI-glxOG1fwoj2o4VffTaN6_R7kzJvX1uQ_ko_5bl-eQKyozXK9CIPuTw7HJNHa5cqwaE-qR9OjSEqtdTJa-9qmzdMvLmmNsMnwf5Bc0zKy_qapaGYfrvdSFm20WKOz0Wq1lvL6dApHLnDLn0H2GlyNWMBqpm6YmY2LatUp0AEttGc674Z63Z0vFDlm3l6MSxAshsPFbzsdvo01mHeXjh1bEbaRmlZ8brN_1TSG_7jQmiFYhmVToe6B1qe9RxnofGHk5gCXNsSYsICZqTDoDr7uTZWdpT1KbVbGajlyxMJ3ABycasNqt_xRsbv15Gc_ijfbwqcyrEeMsRM6uf5Ehj1nUZ9-ZvXGbien2djvbIKWD4O0NHeDeAynoslbSvULzwZnNiK/http%3A%2F%2Fwww.hackerstephens.com)

This message contains information that may be confidential and privileged. Unless you are the intended recipient (or authorized to receive for the intended recipient), you may not use, copy, or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by replying or by phone at (512) 399-3022 and delete the message.

---

**From:** Andrew Stephens

**Sent:** Wednesday, August 31, 2022 10:30 PM

**To:** Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Hussain, Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [dashby@omm.com](mailto:dashby@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com)

**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's Fifth Requests for Production to the PPFA Affiliates.

Andrew

**Andrew B. Stephens**

Partner

**HACKER STEPHENS** LLP

[http://secure-web.cisco.com/1Hi7SNVaGwtgxo1S6bHQN1aod9oTXFxWGzxVEfdgtq-GOekttXvxO9camPjl-glxOG1fwoj2o4VffTaN6\\_R7kzJvX1uQ\\_ko\\_5bl-eQKyozXK9CIPuTw7HJNHa5cqwaE-qR9OjSEqtdTJa-9qmzdMvLmmNsMnwf5Bc0zKy\\_qapaGYfrvdSFm20WKOz0Wq1vL6dApHlnDLn0H2GlyNWMbqpm6YmY2LatUp0AETtGc674Z63ZOvFDlm3I6MSxAshsPFbzsDvo01mHeXjh1bEbaRmlZ8brN\\_1TSG\\_7jQmiFYhmVToe6B1qe9RxnofGHk5gCXNsSYsICZqTDoDr7uTZWdpT1KbVbGajlryxMJ3ABycasNqt\\_xRsbv15Gc\\_jlfbwqcyrEeMsRM6uf5Ehj1nUZ9-ZvXGbien2djvbIKWD4O0NHeDeAynoslbSvULzwZnNiK/http%3A%2F%2Fwww.hackerstephens.com](http://secure-web.cisco.com/1Hi7SNVaGwtgxo1S6bHQN1aod9oTXFxWGzxVEfdgtq-GOekttXvxO9camPjl-glxOG1fwoj2o4VffTaN6_R7kzJvX1uQ_ko_5bl-eQKyozXK9CIPuTw7HJNHa5cqwaE-qR9OjSEqtdTJa-9qmzdMvLmmNsMnwf5Bc0zKy_qapaGYfrvdSFm20WKOz0Wq1vL6dApHlnDLn0H2GlyNWMbqpm6YmY2LatUp0AETtGc674Z63ZOvFDlm3I6MSxAshsPFbzsDvo01mHeXjh1bEbaRmlZ8brN_1TSG_7jQmiFYhmVToe6B1qe9RxnofGHk5gCXNsSYsICZqTDoDr7uTZWdpT1KbVbGajlryxMJ3ABycasNqt_xRsbv15Gc_jlfbwqcyrEeMsRM6uf5Ehj1nUZ9-ZvXGbien2djvbIKWD4O0NHeDeAynoslbSvULzwZnNiK/http%3A%2F%2Fwww.hackerstephens.com)

This message contains information that may be confidential and privileged. Unless you are the intended recipient (or authorized to receive for the intended recipient), you may not use, copy, or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by replying or by phone at (512) 399-3022 and delete the message.

---

**From:** Andrew Stephens

**Sent:** Tuesday, August 23, 2022 11:13 AM

**To:** Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Hussain, Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [dashby@omm.com](mailto:dashby@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com)

**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's Fourth Requests for Production to the PPFA Affiliates.

Andrew

**Andrew B. Stephens**

Partner

**HACKER STEPHENS** LLP

[http://secure-web.cisco.com/1Hi7SNVaGwtgxo1S6bHQN1aod9oTXFxWGzxVEfdgtq-GOekttXvxO9camPjl-glxOG1fwoj2o4VffTaN6\\_R7kzJvX1uQ\\_ko\\_5bl-eQKyozXK9CIPuTw7HJNHa5cqwaE-qR9OjSEqtdTJa-9qmzdMvLmmNsMnwf5Bc0zKy\\_qapaGYfrvdSFm20WKOz0Wq1vL6dApHlnDLn0H2GlyNWMbqpm6YmY2LatUp0AETtGc674Z63ZOvFDlm3I6MSxAshsPFbzsDvo01mHeXjh1bEbaRmlZ8brN\\_1TSG\\_7jQmiFYhmVToe6B1qe9RxnofGHk5gCXNsSYsICZqTDoDr7uTZWdpT1KbVbGajlryxMJ3ABycasNqt\\_xRsbv15Gc\\_jlfbwqcyrEeMsRM6uf5Ehj1nUZ9-ZvXGbien2djvbIKWD4O0NHeDeAynoslbSvULzwZnNiK/http%3A%2F%2Fwww.hackerstephens.com](http://secure-web.cisco.com/1Hi7SNVaGwtgxo1S6bHQN1aod9oTXFxWGzxVEfdgtq-GOekttXvxO9camPjl-glxOG1fwoj2o4VffTaN6_R7kzJvX1uQ_ko_5bl-eQKyozXK9CIPuTw7HJNHa5cqwaE-qR9OjSEqtdTJa-9qmzdMvLmmNsMnwf5Bc0zKy_qapaGYfrvdSFm20WKOz0Wq1vL6dApHlnDLn0H2GlyNWMbqpm6YmY2LatUp0AETtGc674Z63ZOvFDlm3I6MSxAshsPFbzsDvo01mHeXjh1bEbaRmlZ8brN_1TSG_7jQmiFYhmVToe6B1qe9RxnofGHk5gCXNsSYsICZqTDoDr7uTZWdpT1KbVbGajlryxMJ3ABycasNqt_xRsbv15Gc_jlfbwqcyrEeMsRM6uf5Ehj1nUZ9-ZvXGbien2djvbIKWD4O0NHeDeAynoslbSvULzwZnNiK/http%3A%2F%2Fwww.hackerstephens.com)

This message contains information that may be confidential and privileged. Unless you are the intended recipient (or authorized to receive for the intended recipient), you may not use, copy, or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by replying or by phone at (512) 399-3022 and delete the message.

**From:** Andrew Stephens

**Sent:** Wednesday, August 3, 2022 4:18 PM

**To:** Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Hussain, Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [dashby@omm.com](mailto:dashby@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com)

**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's Fifth Requests for Production to Defendant Planned Parenthood Federation of America, Inc.

Andrew

**Andrew B. Stephens**

Partner

**HACKER STEPHENS LLP**

[http://secure-web.cisco.com/1Hi7SNvaGwtgxo1S6bHQN1aod9oTXFxWGzxVEfdqtq-GOekttXvxO9camPjl-qlxOG1woj2o4VffTaN6\\_R7kzJvX1uQ\\_ko\\_5bl-eQKyozXK9CIPuTw7HJNHa5cqwaE-qR9OjSEqtdTJa-9qmzdMvLmmNsMnwf5Bc0zKy\\_qapaGYfrvdSFm20WKOz0Wq1lvL6dApHLnDLn0H2GlyNWMBqpm6YmY2LatUp0AEttGc674Z63Z0vFDlml3i6MSxAshsPFbzsDvo01mHeXjh1bEbaRmlZ8brN\\_1TSG\\_7jQmiFYhmVToe6B1qe9RxnofGHk5gCXNsSYsICZqTDoDr7uTZWdpT1KbVbGajryxMJ3ABycasNqt\\_xRsbv15Gc\\_jfbwqcyrEeMsRM6uf5Ehj1nUZ9-ZvXGbien2djvbIKWD400NHeDeAynoslbSvULzwZnNiK/http%3A%2F%2Fwww.hackerstephens.com](http://secure-web.cisco.com/1Hi7SNvaGwtgxo1S6bHQN1aod9oTXFxWGzxVEfdqtq-GOekttXvxO9camPjl-qlxOG1woj2o4VffTaN6_R7kzJvX1uQ_ko_5bl-eQKyozXK9CIPuTw7HJNHa5cqwaE-qR9OjSEqtdTJa-9qmzdMvLmmNsMnwf5Bc0zKy_qapaGYfrvdSFm20WKOz0Wq1lvL6dApHLnDLn0H2GlyNWMBqpm6YmY2LatUp0AEttGc674Z63Z0vFDlml3i6MSxAshsPFbzsDvo01mHeXjh1bEbaRmlZ8brN_1TSG_7jQmiFYhmVToe6B1qe9RxnofGHk5gCXNsSYsICZqTDoDr7uTZWdpT1KbVbGajryxMJ3ABycasNqt_xRsbv15Gc_jfbwqcyrEeMsRM6uf5Ehj1nUZ9-ZvXGbien2djvbIKWD400NHeDeAynoslbSvULzwZnNiK/http%3A%2F%2Fwww.hackerstephens.com)

This message contains information that may be confidential and privileged. Unless you are the intended recipient (or authorized to receive for the intended recipient), you may not use, copy, or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by replying or by phone at (512) 399-3022 and delete the message.

---

**From:** Andrew Stephens

**Sent:** Thursday, July 7, 2022 12:16 PM

**To:** Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Hussain, Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [dashby@omm.com](mailto:dashby@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com)

**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's Fourth Requests for Production to Defendant Planned Parenthood Federation of America, Inc., and Relator's Third Requests for Production to Defendants Planned Parenthood Gulf Coast, Inc., Planned Parenthood Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc.

Andrew

**Andrew B. Stephens**

Partner

**HACKER STEPHENS LLP**

[http://secure-web.cisco.com/1Hi7SNvaGwtgxo1S6bHQN1aod9oTXFxWGzxVEfdqtq-GOekttXvxO9camPjl-qlxOG1woj2o4VffTaN6\\_R7kzJvX1uQ\\_ko\\_5bl-eQKyozXK9CIPuTw7HJNHa5cqwaE-qR9OjSEqtdTJa-9qmzdMvLmmNsMnwf5Bc0zKy\\_qapaGYfrvdSFm20WKOz0Wq1lvL6dApHLnDLn0H2GlyNWMBqpm6YmY2LatUp0AEttGc674Z63Z0v](http://secure-web.cisco.com/1Hi7SNvaGwtgxo1S6bHQN1aod9oTXFxWGzxVEfdqtq-GOekttXvxO9camPjl-qlxOG1woj2o4VffTaN6_R7kzJvX1uQ_ko_5bl-eQKyozXK9CIPuTw7HJNHa5cqwaE-qR9OjSEqtdTJa-9qmzdMvLmmNsMnwf5Bc0zKy_qapaGYfrvdSFm20WKOz0Wq1lvL6dApHLnDLn0H2GlyNWMBqpm6YmY2LatUp0AEttGc674Z63Z0v)

This message contains information that may be confidential and privileged. Unless you are the intended recipient (or authorized to receive for the intended recipient), you may not use, copy, or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by replying or by phone at (512) 399-3022 and delete the message.

---

**From:** Andrew Stephens

**Sent:** Thursday, June 16, 2022 4:12 PM

**To:** Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Hussain, Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>;

[lgodesky@omm.com](mailto:lgodesky@omm.com); [dashby@omm.com](mailto:dashby@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com)

**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's Third Requests for Production to Defendant Planned Parenthood Federation of America, Inc., and Relator's Second Requests for Production to Defendants Planned Parenthood Gulf Coast, Inc., Planned Parenthood Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc.

Andrew

**Andrew B. Stephens**

Partner

**HACKER STEPHENS** LLP

[http://secure-web.cisco.com/1HI7SNVaGwtgxo1S6bHQN1aod9oTXFxWGzxVEfdgtq-GOekttXvxO9camPjl-glxOG1fwoj2o4VffTaN6\\_R7kzJvX1uQ\\_ko\\_5bl-eQKyozXK9CIPuTw7HJNHa5cqwaE-gR9OjSEqtdTJa-9qmzdMvLmmNsMnwf5Bc0zKy\\_qapaGYfrvdSFm20WKOz0Wq1lvL6dApHlnDLn0H2GlyNWMBqpm6YmY2LatUp0AEttGc674Z63Z0vFDIm3I6MSxAshsPFbzsDvo01mHeXjh1bEbaRmlZ8brN 1TSG 7jQmiFYhmVToe6B1qe9RxnofGHk5gCXNsSYsICZqTDoDr7uTZWdpT1KbVbGajIryxMJ3ABycasNqt\\_xRsbvI5Gc\\_jlfbwqcyrEeMsRM6uf5Ehj1nUZ9-ZvXGbien2djvbIKWD4O0NHeDeAynoslbSvULzwZnNiK/http%3A%2F%2Fwww.hackerstephens.com](http://secure-web.cisco.com/1HI7SNVaGwtgxo1S6bHQN1aod9oTXFxWGzxVEfdgtq-GOekttXvxO9camPjl-glxOG1fwoj2o4VffTaN6_R7kzJvX1uQ_ko_5bl-eQKyozXK9CIPuTw7HJNHa5cqwaE-gR9OjSEqtdTJa-9qmzdMvLmmNsMnwf5Bc0zKy_qapaGYfrvdSFm20WKOz0Wq1lvL6dApHlnDLn0H2GlyNWMBqpm6YmY2LatUp0AEttGc674Z63Z0vFDIm3I6MSxAshsPFbzsDvo01mHeXjh1bEbaRmlZ8brN 1TSG 7jQmiFYhmVToe6B1qe9RxnofGHk5gCXNsSYsICZqTDoDr7uTZWdpT1KbVbGajIryxMJ3ABycasNqt_xRsbvI5Gc_jlfbwqcyrEeMsRM6uf5Ehj1nUZ9-ZvXGbien2djvbIKWD4O0NHeDeAynoslbSvULzwZnNiK/http%3A%2F%2Fwww.hackerstephens.com)

This message contains information that may be confidential and privileged. Unless you are the intended recipient (or authorized to receive for the intended recipient), you may not use, copy, or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by replying or by phone at (512) 399-3022 and delete the message.

---

**From:** Andrew Stephens

**Sent:** Thursday, June 2, 2022 10:54 PM

**To:** Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Hussain, Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [dashby@omm.com](mailto:dashby@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com)

**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's Second Requests for Production to Defendant Planned Parenthood Federation of America, Inc.

Andrew

**Andrew B. Stephens**

Partner

**HACKER STEPHENS** LLP

[http://secure-web.cisco.com/1HI7SNVaGwtgxo1S6bHQN1aod9oTxFxWGzxVEfdgtq-G0ekttXvxO9camPjI-glxOG1fwoj2o4VffTaN6\\_R7kzJvX1uQ\\_ko\\_5bl-eQKyozXK9CIPuTw7HJNHa5cqwaE-gR9OjSEqtdTJa-9qmzdMvLmmNsMnwf5Bc0zKy\\_qapaGYfrvdSFm20WKOz0Wq1vL6dApHlnDLn0H2GlyNWMBqpm6YmY2LatUp0AEttGc674Z63Z0vFDIm3I6MSxAshsPFbzsDvo01mHeXjh1bEbaRmlZ8brN\\_1TSG\\_7jQmiFYhmVToe6B1qe9RxnofGHk5gCXNsSYsICZqTDoDr7uTZWdpT1KbVbGajlryxMJ3ABycasNqt\\_xRsbv15Gc\\_jlfbwqcyrEeMsRM6uf5Ehj1nUZ9-ZvXGbien2djvblKWD4O0NHeDeAynoslbSvULzwZnNiK/http%3A%2Fwww.hackerstephens.com](http://secure-web.cisco.com/1HI7SNVaGwtgxo1S6bHQN1aod9oTxFxWGzxVEfdgtq-G0ekttXvxO9camPjI-glxOG1fwoj2o4VffTaN6_R7kzJvX1uQ_ko_5bl-eQKyozXK9CIPuTw7HJNHa5cqwaE-gR9OjSEqtdTJa-9qmzdMvLmmNsMnwf5Bc0zKy_qapaGYfrvdSFm20WKOz0Wq1vL6dApHlnDLn0H2GlyNWMBqpm6YmY2LatUp0AEttGc674Z63Z0vFDIm3I6MSxAshsPFbzsDvo01mHeXjh1bEbaRmlZ8brN_1TSG_7jQmiFYhmVToe6B1qe9RxnofGHk5gCXNsSYsICZqTDoDr7uTZWdpT1KbVbGajlryxMJ3ABycasNqt_xRsbv15Gc_jlfbwqcyrEeMsRM6uf5Ehj1nUZ9-ZvXGbien2djvblKWD4O0NHeDeAynoslbSvULzwZnNiK/http%3A%2Fwww.hackerstephens.com)

This message contains information that may be confidential and privileged. Unless you are the intended recipient (or authorized to receive for the intended recipient), you may not use, copy, or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by replying or by phone at (512) 399-3022 and delete the message.

---

**From:** Andrew Stephens

**Sent:** Friday, May 27, 2022 11:51 PM

**To:** Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Hussain,

Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>

**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>

**Subject:** United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's First Interrogatories and Requests for Production to Defendants.

Andrew

**Andrew B. Stephens**

Partner

**HACKER STEPHENS** LLP

[http://secure-web.cisco.com/1HI7SNVaGwtgxo1S6bHQN1aod9oTxFxWGzxVEfdgtq-G0ekttXvxO9camPjI-glxOG1fwoj2o4VffTaN6\\_R7kzJvX1uQ\\_ko\\_5bl-eQKyozXK9CIPuTw7HJNHa5cqwaE-gR9OjSEqtdTJa-9qmzdMvLmmNsMnwf5Bc0zKy\\_qapaGYfrvdSFm20WKOz0Wq1vL6dApHlnDLn0H2GlyNWMBqpm6YmY2LatUp0AEttGc674Z63Z0vFDIm3I6MSxAshsPFbzsDvo01mHeXjh1bEbaRmlZ8brN\\_1TSG\\_7jQmiFYhmVToe6B1qe9RxnofGHk5gCXNsSYsICZqTDoDr7uTZWdpT1KbVbGajlryxMJ3ABycasNqt\\_xRsbv15Gc\\_jlfbwqcyrEeMsRM6uf5Ehj1nUZ9-ZvXGbien2djvblKWD4O0NHeDeAynoslbSvULzwZnNiK/http%3A%2Fwww.hackerstephens.com](http://secure-web.cisco.com/1HI7SNVaGwtgxo1S6bHQN1aod9oTxFxWGzxVEfdgtq-G0ekttXvxO9camPjI-glxOG1fwoj2o4VffTaN6_R7kzJvX1uQ_ko_5bl-eQKyozXK9CIPuTw7HJNHa5cqwaE-gR9OjSEqtdTJa-9qmzdMvLmmNsMnwf5Bc0zKy_qapaGYfrvdSFm20WKOz0Wq1vL6dApHlnDLn0H2GlyNWMBqpm6YmY2LatUp0AEttGc674Z63Z0vFDIm3I6MSxAshsPFbzsDvo01mHeXjh1bEbaRmlZ8brN_1TSG_7jQmiFYhmVToe6B1qe9RxnofGHk5gCXNsSYsICZqTDoDr7uTZWdpT1KbVbGajlryxMJ3ABycasNqt_xRsbv15Gc_jlfbwqcyrEeMsRM6uf5Ehj1nUZ9-ZvXGbien2djvblKWD4O0NHeDeAynoslbSvULzwZnNiK/http%3A%2Fwww.hackerstephens.com)

This message contains information that may be confidential and privileged. Unless you are the intended recipient (or authorized to receive for the intended recipient), you may not use, copy, or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by replying or by phone at (512) 399-3022 and delete the message.

---

This communication may contain information that is legally privileged, confidential or exempt from disclosure. If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is strictly prohibited. Anyone who receives this message in error should notify the sender immediately by telephone or by return e-mail and delete it from his or her computer.

For more information about Arnold & Porter, click here:

<http://www.arnoldporter.com>

---

This communication may contain information that is legally privileged, confidential or exempt from disclosure. If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is strictly prohibited. Anyone who receives this message in error should notify the sender immediately by telephone or by return e-mail and delete it from his or her computer.

For more information about Arnold & Porter, click here:

<http://www.arnoldporter.com>

---

This communication may contain information that is legally privileged, confidential or exempt from disclosure. If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is strictly prohibited. Anyone who receives this message in error should notify the sender immediately by telephone or by return e-mail and delete it from his or her computer.

For more information about Arnold & Porter, click here:

<http://www.arnoldporter.com>